October 12, 2011

Ms. Jennifer Sutter Voluntary Cleanup and Portland Harbor Section Oregon Department of Environmental Quality 2020 SW Fourth Ave., Suite 400 Portland, OR 97201-4987

Subject: Third Quarter 2011 Progress Report for Evraz Oregon Steel Facility in Portland, Oregon WPMVC-NWR-00-10

Dear Ms. Sutter,

On behalf of Evraz Oregon Steel (EOS), AECOM Environment submits to the Oregon Department of Environmental Quality (DEQ) this Third Quarter 2011 Progress Report for the EOS facility in Portland, Oregon, located at 14400 N. Rivergate Blvd. This report is submitted in accordance with Section II.H of the June 2000 Voluntary Remediation Investigation Source Control Measure Agreement (Voluntary Agreement) for the EOS facility. This report documents and discusses the project activities from July 1 through September 30, 2011 (third quarter 2011). In addition, this report describes activities planned for the fourth quarter of 2011.

Actions Completed During the Third Quarter 2011

Source control and risk assessment activities were completed during the third quarter of 2011.

Stormwater Source Control:

EOS submitted a stormwater source control update to DEQ on August 17th discussing the status of the stormwater treatment chemical modifications, timing of additional loading study sampling, and planned maintenance activities.

- Stormwater Treatment Chemical EOS is not adding treatment chemical during dry
 weather flow as the flow is not turbid. EOS is evaluating an appropriate trigger level for
 initiating chemical addition based on turbidity. In addition, EOS is retrofitting the treatment
 system to accommodate Chitosan use and turbidity measurements.
- Stormwater Loading Study Two of three dry weather stormwater loading samples were collected on August 24th and August 31st at Northern Outfall 003.
- Stormwater Clarification Basin Maintenance Basin cleaning was completed during the week of September 19th as detailed in the stormwater source control update letter submitted to DEQ on August 17th.

Riverbank Source Control:

Glenn Grette, on behalf of EOS discussed the Habitat Equivalency Analysis (HEA) methodology with Genevieve Angle of NOAA National Marine Fisheries (NMFS) on August 29th. NMFS confirmed the methodology was acceptable. An existing conditions survey to support the HEA was performed on September 20st and 21st.

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Upland Remedial Action / Risk Assessment:

The Upland Human Health Risk Assessment was submitted to DEQ on September 16th and resubmitted with a minor revision on September 19th.

Problems Experienced During the Third Quarter 2011

No significant problems were encountered during the third quarter of 2011.

Actions Scheduled for the Fourth Quarter 2011

EOS is planning the following activities for the fourth Quarter 2011:

Stormwater Source Control:

- Provide DEQ additional information on the planned treatment chemical and triggers for chemical addition:
- Complete stormwater treatment system modifications and perform optimization testing;
- Collect final dry weather stormwater loading sample at Northern Outfall 003 (weather permitting);
 and
- Continue wet weather monitoring for stormwater loading study.

Riverbank Source Control:

- Prepare Habitat Equivalency Analysis (HEA);
- Meet with DEQ, USACE and NMFS to discuss the HEA and next steps on riverbank source control permitting.

Upland Remedial Action/Risk Assessment:

Respond to any DEQ comments on the Upland Human Health Risk Assessment.

If you have any questions regarding this report, please contact me at (503) 227-1042 x24.

Yours sincerely,

Mark Havighorst Project Manager

cc: Kristine Koch – EPA (Electronic Copy)
Debbie Deetz Silva and Drew Gilpin – EOS
Joan Snyder – Stoel Rives
Linda Baker, File 60150686-202 – AECOM

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